

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTHERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA, : **NOTICE OF MOTION**  
-against- :  
WILSON DANIEL FREITA DA COSTA : Docket No. 23-CR-610 (PKC)  
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PLEASE TAKE NOTICE THAT, upon the memorandum of law, dated March 17, 2025, and the accompanying declaration of Leslie Nelson, sworn to March 16, 2025, Non-Party Leslie Nelson will move this Court before the Honorable P. Kevin Castel at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time convenient to the Court, for an Order:

- 1) granting Mr. Nelson's motion to intervene and to redact or anonymize references to his name from the government's memorandum of law in opposition to Defendant's post-trial motions, dated December 20, 2024 (ECF No. 82) and the Court's Opinion and Order, dated February 14, 2025 (ECF No. 91);
- 2) requiring the parties to redact or anonymize references to Mr. Nelson in future public filings in this case;
- 3) sealing this motion and all papers filed in support or in opposition to this motion; and
- 4) any other relief the Court deems necessary and appropriate.

Dated: New York, New York  
March 17, 2025

/s/ Eric M. Creizman  
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